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10 Attorneys for Third Party Brian Dubinsky

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14
15 MARK GRANTHAM,

16 Plaintiff,

17 v.

18
19 WAL-MART STORES, INC., an
20 Arkansas corporation,

21 AND

22 SLB TOYS USA, INC. d/b/a TOY
23 QUEST, a New York corporation,

24 AND

25 MANLEY TOYS LTD, a Hong Kong
26 corporation,

27 Defendants.

28 Case No. CV11 80 182 MISC.

(Action pending in the United States
District Court for the Western District
of Missouri Southern Division Case No.
08-3466-CV-S-GAF)

DISCOVERY MATTER

**STIPULATION AND [PROPOSED]
ORDER ON MOTION TO QUASH
THIRD PARTY SUBPOENA
SERVED ON LITTLER
MENDELSON, P.C.**

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1 2. Counsel for Brian Dubinsky will deliver all privilege/privacy logs that
2 were created in the *Sefchick* case to counsel for SLB.

3 3. SLB will be responsible for removing all documents listed on the
4 privilege/privacy logs from the set of documents and/or electronic media that will be
5 produced to Grantham.

6 4. Prior to producing the documents and/or electronic media to Grantham,
7 SLB shall provide a copy of the proposed production to the undersigned counsel for
8 Brian Dubinsky. Counsel for Mr. Dubinsky will have two weeks to review the
9 proposed production to confirm that no privileged/private documents will be
10 produced to Grantham.

11
12 Dated: September 19, 2011

VALLE MAKOFF LLP

13 14 15 By:

Jeffrey B. Valle
Attorneys for Third Party
Brian Dubinsky

16
17 Dated: September 19, 2011

EWING & EWING P.C.

18
19 20 21 By:

R. Craig Ewing
Attorneys for Mark Grantham

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Facsimile: (310) 476-0333

Attorneys for Third Party Brian Dubinsky

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARK GRANTHAM,

Case No. CV11 80 182 MISC

Plaintiff,

V.

WAL-MART STORES, INC., an
Arkansas corporation,

(Action pending in the United States District Court for the Western District of Missouri Southern Division Case No. 08-3466-CV-S-GAF)

AND

**SLB TOYS USA, INC. d/b/a TOY
QUEST, a New York corporation,**

AND

MANLEY TOYS LTD, a Hong Kong corporation,

Defendants.

DISCOVERY MATTER

**[PROPOSED] ORDER ON MOTION
TO QUASH THIRD PARTY
SUBPOENA SERVED ON LITTLER
MENDELSON, P.C.**

1 Upon consideration of the stipulation filed by Third Party Brian Dubinsky
2 and Plaintiff Mark Grantham, by and through their respective attorneys, it is hereby
3 ordered as follows:

4 1. Littler Mendelson, P.C. will deliver its response to the Littler Subpoena
5 to John S. Sandberg, counsel for SLB Toys USA, Inc. ("SLB"), who is located at
6 Sandberg Phoenix & von Gontard P.C., 600 Washington, 15th Floor, St. Louis,
7 Missouri 63101. Littler Mendelson, P.C., will also deliver its response to the Littler
8 Subpoena to Jeffrey B. Valle, counsel for Brian Dubinsky, Valle Makoff LLP, 11911
9 San Vicente Blvd., Suite 324, Los Angeles, California 90049.

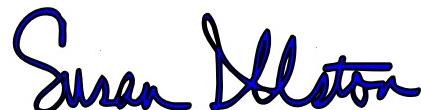
10 2. Counsel for Brian Dubinsky will deliver all privilege/privacy logs that
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15 4. Prior to producing the documents and/or electronic media to Grantham,
16 SLB shall provide a copy of the proposed production to the undersigned counsel for
17 Brian Dubinsky. Counsel for Mr. Dubinsky will have two weeks to review the
18 proposed production to confirm that no privileged/private documents will be
19 produced to Grantham.

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IT IS SO ORDERED.

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Dated: 9/21/11



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Hon. Susan Illston